

Defendant Exhibit E

[Roetter Deposition]

In re Twitter Inc. Securities Litigation

Videotaped Deposition of

ALEX ROETTER

January 31, 2019

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1 Q. (BY MS. OLIVER) If you look down a
2 little bit further, about halfway down, it says,
3 "Problem: Lack of teamwork and shared goals." "The
4 consumer pillars (consumption, growth, et cetera) do
5 not operate as a single consumer team."

6 Did I read that correctly?

7 A. Yes.

8 Q. What did "pillar" mean?

9 A. I believe it just meant a -- a set of
10 people. I think it's a figure of speech; set of
11 people working on something.

12 Q. Would a pillar have been within a team,
13 or would it have been a team?

14 MS. GOODHART: Objection, calls for
15 speculation.

16 A. I don't -- I don't know. I think
17 neither of them are well-defined.

18 Q. (BY MS. OLIVER) What does "et cetera"
19 refer to in that parenthetical that I just read?
20 "Consumer growth, et cetera."

21 MS. GOODHART: Objection, form.

22 A. It refers to other pillars. It's a --
23 it's hard to know exactly.

24 Q. (BY MS. OLIVER) Another consumer
25 pillar, presumably?

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1 the document.

2 A. I'm sorry. Can you repeat the question?

3 Q. (BY MS. OLIVER) I'm going to ask a
4 different question instead.

5 So the document next says "What we are
6 doing/have done about it, making the consumer leads
7 write joint OKRs together that they all sign up for,
8 which will directly shape the work of all pillars. In
9 particular, driving DAUs by minimizing user churn will
10 be the number one priority for all efforts. We are
11 emphasizing over and over that everyone should be
12 focused on user churn and driving DAUs, nothing else."

13 Did I read that correctly?

14 A. I believe so.

15 Q. What are OKRs?

16 A. It's an acronym.

17 Q. What does OKR stand for?

18 A. It stands for objectives and key
19 results.

20 Q. When you wrote this, you believed that
21 driving DAUs by minimizing user churn will be the
22 number one priority for all efforts. Correct?

23 MS. GOODHART: Objection, vague.

24 A. I don't remember.

25 Q. (BY MS. OLIVER) Would you have written

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1 A. Correct.

2 Q. Q2 OKRs would be second quarter OKRs?

3 A. Correct.

4 Q. In 2015?

5 MS. GOODHART: Objection, vague.

6 A. I can't tell the year.

7 Q. (BY MS. OLIVER) The e-mail chain is
8 from March of 2015. Does that help you understand
9 whether this was the second quarter of 2015 or a
10 different year?

11 A. It does.

12 Q. Was it the second quarter of 2015?

13 A. It looks like it.

14 Q. So the first comment, starting at the
15 top -- actually, let me go back to the process.

16 Were the comments displayed as e-mails
17 where the oldest one is on the bottom, or was the
18 oldest one on the top?

19 A. I believe the oldest one is on the top.

20 Q. Okay. So the top e-mail -- or the top
21 comment is yours. And it says, "Top-level company OKR
22 is churn. See that page. Can we add a goal here on
23 reducing churn?"

24 Did I read that correctly?

25 A. Yes, you read that correctly.

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1 Q. You're seeking to add a KR for the C&D
2 pillar OKRs related to reducing churn. Correct?

3 MS. GOODHART: Objection, form.

4 A. I think what I'm saying here is one of
5 the top-level company OKRs is churn, so could we
6 reflect that here.

7 Q. (BY MS. OLIVER) In the C&D pillar OKRs.

8 A. Correct.

9 Q. And Mr. Srivastava says, "I don't think
10 churn is a good KR for us." Correct?

11 MS. GOODHART: Objection, the document
12 speaks for itself.

13 A. He does say that.

14 Q. (BY MS. OLIVER) And your response to
15 him is, "Yeah, the idea is the whole company should be
16 reducing churn." Correct?

17 MS. GOODHART: Objection, the document
18 speaks for itself.

19 A. I see that I typed that, yes.

20 Q. (BY MS. OLIVER) And in the first
21 exhibit we looked at today, Building the Execution
22 Engine, which was Exhibit 184, it states, "In
23 particular, driving DAUs by minimizing user churn will
24 be the number one priority for all our efforts."
25 Correct?

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1 MS. GOODHART: Objection,
2 mischaracterizes the documents and the witness's
3 testimony.

4 Q. (BY MS. OLIVER) If you want to pull it
5 out and confirm that I actually read it correctly,
6 feel free to do so.

7 That's in that second-to-last paragraph
8 on the first page. Did I read that correctly?

9 MS. GOODHART: I'm going to object.
10 Vague and ambiguous.

11 A. What's the -- what's the phrase you want
12 me to --

13 Q. (BY MS. OLIVER) "In particular, driving
14 DAUs by minimizing user churn will be the number one
15 priority for all efforts."

16 MS. GOODHART: Objection, vague and
17 ambiguous.

18 A. So these documents don't seem linked to
19 me.

20 Q. (BY MS. OLIVER) Did I read that
21 statement correctly?

22 MS. GOODHART: Objection, the document
23 speaks for itself on that statement.

24 A. That particular sentence, you read
25 correctly, yes.

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REPORTER'S CERTIFICATE

STATE OF COLORADO)
) ss.
 CITY AND COUNTY OF DENVER)

I, SHERRY WALLIN, Certified Realtime Reporter, Registered Merit Reporter and Notary Public ID 19874212873, State of Colorado, do hereby certify that previous to the commencement of the examination, the said ALEX ROETTER was duly sworn or affirmed by me to testify to the truth in relation to the matters in controversy between the parties hereto; that the said deposition was taken in machine shorthand by me at the time and place aforesaid and was thereafter reduced to typewritten form; that the foregoing is a true transcript of the questions asked, testimony given, and proceedings had.

I further certify that I am not employed by, related to, nor of counsel for any of the parties herein, nor otherwise interested in the outcome of this litigation.

IN WITNESS WHEREOF, I have affixed my signature this 11th day of February, 2019.

My commission expires May 14, 2019.

 X Reading and Signing was requested.

 Reading and Signing was waived.

 Reading and Signing was not required.

 Sherry Wallin
 Certified Realtime Reporter
 Registered Merit Reporter